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## LATHAM & WATKINS LLP

March 29, 2023

### VIA ECF

Hon. Paul A. Engelmayer  
United States District Court  
Southern District of New York  
40 Foley Square, Room 1305  
New York, New York 10007

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Re: *Altimeo Asset Management v. Qihoo 360 Technology Co. Ltd. et al.*,  
No. 1:19-cv-10067-PAE (S.D.N.Y.)

Dear Judge Engelmayer:

We represent Defendant Hongyi Zhou in the above-referenced matter. We write pursuant to Rules 1.A and 1.E of the Court's Individual Rules and Practices in Civil Cases to request (i) an adjournment of the case management conference currently scheduled for April 5, 2023, and (ii) an extension of time for Mr. Zhou to answer the First Amended Complaint (the "FAC"). Plaintiffs, Defendant Qihoo 360 Technology Co. Ltd. ("Qihoo"), and Defendant Eric X. Chen have consented to both requests.

### April 5, 2023 Conference

On March 21, 2023, the Court issued an order granting in part and denying in part Mr. Zhou's motion to dismiss the FAC, and setting a case management conference for April 5, 2023, at 11:30 a.m. (ECF No. 145). On March 27, 2023, the Court rescheduled the conference to April 5, 2023, at 1:30 p.m. (ECF No. 146). However, because I was previously scheduled to be in all-day testimony before the U.S. Securities and Exchange Commission with a different client in an unrelated matter (and this testimony is only several days away), we respectfully request a brief adjournment of the conference from April 5, 2023. To facilitate rescheduling, we have consulted with all other counsel concerning near-term availability, particularly in light of upcoming religious observances, and all counsel are available on either April 10, 2023 or April 17, 2023 should either of those dates be convenient for the Court.

### Mr. Zhou's Deadline to Answer FAC

In light of the Court's decision resolving Mr. Zhou's motion to dismiss, the current deadline for Mr. Zhou to answer the FAC will be April 4, 2023. See Fed. R. Civ. P. 12(a)(4)(A). To allow him sufficient time to prepare a response to the 341-paragraph FAC, Mr. Zhou respectfully requests a three-week extension such that his Answer will be due on April 25, 2023.

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Mr. Zhou has not previously requested adjournments of the case management conference or extensions of time to answer the complaint. The other parties in this case did previously request two adjournments of certain deadlines related to discovery and class certification set forth in the Court's then-operative scheduling order, which the Court granted as part of its decision to stay all deadlines pending resolution of Mr. Zhou's motion to dismiss (ECF Nos. 126-27).

We appreciate the Court's consideration of these requests and are available to answer any questions Your Honor may have.

Respectfully submitted,

/s/ Jason C. Hegt  
Jason C. Hegt  
Of LATHAM & WATKINS LLP

Granted. The in-person conference is rescheduled to April 10, 2023 at 11 a.m. In light of this adjournment, the joint letter, case management plan, and proposed briefing scheduled described in docket 145 are due April 5, 2023. The deadline for Zhou to answer the First Amended Complaint, Dkt. 53, is April 25, 2023. SO ORDERED.



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PAUL A. ENGELMAYER  
United States District Judge  
March 29, 2023